

**Objections to Closure and Responses Regarding  
D. Holman Revocable Trust, 2186 Redondo Beach Boulevard, Torrance  
Claim No: 6599**

The Review Summary Report recommending closure was emailed to the Los Angeles Regional Water Quality Control Board (Regional Water Board) on July 3, 2015, with a request for comments or a teleconference. The email requested a response by July 17, 2015. No further communication or a request for teleconference was received by July 22, 2015. State Water Board staff determined that the lack of response indicated the Regional Water Board had no objections to closure.

According to the Low Threat Closure policy Checklist, finalized on May 15, 2014, the Regional Water Board staff previously objected to UST case closure because:

- Comment 1: The case does not meet Policy groundwater criteria.  
Response 1: The case meets Policy Criterion 1 by Class 2. The contaminant plume that exceeds water quality objectives is less than 250 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 1,000 feet from the defined plume boundary. The dissolved concentration of benzene is less than 3,000 micrograms per liter ( $\mu\text{g/L}$ ) and the dissolved concentration of methyl tert-butyl ether (MTBE) is less than 1,000  $\mu\text{g/L}$ .
- Comment 2: The case does not meet Policy vapor criteria.  
Response 2: The case meets Policy Criterion 2a by Scenario 4 with a bioattenuation zone based on soil vapor samples collected in September 2014. The maximum benzene, ethylbenzene, and naphthalene concentrations in soil gas are less than, respectively, 280,000 micrograms per cubic meter ( $\mu\text{g/m}^3$ ), 3,600,000  $\mu\text{g/m}^3$ , and 310,000  $\mu\text{g/m}^3$ , at a depth of five feet. These levels meet the Commercial soil gas criteria where the soil gas sample locations are overlain by soil containing less than 100 mg/kg of TPH and where the oxygen soil vapor concentration is equal to or greater than 4 percent.